

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CIVIL ACTION
NO. 04-11578PBS

FIREMAN'S FUND INSURANCE
COMPANY
As Subrogee of Hodan Properties, Inc.

Plaintiff,
vs.

FIRE SYSTEMS, INC.,
FIRE SUPPRESSION SYSTEMS OF
NEW ENGLAND, INC.,
PRO CON, INC., and
BRIERE & PAQUETTE, INC. f/k/a
PAQUETTE ELECTRIC CO, INC.

Defendants

**DEFENDANT, FIRE SUPPRESSION SYSTEMS OF NEW
ENGLAND, INC.'S SUPPLEMENTAL DISCLOSURE PER ORDER SETTING
CASE FOR TRIAL**

Defendant, Fire Suppression Systems of New England, Inc. (hereinafter "FSS"), makes the following supplemental disclosure as required by above-referenced Order:

2(a)

1. FSI Service Contract (1 pg);
2. FSI Inspection Report 11/20/02 (3 pgs);
3. FSI Invoice dated 12/10/02 (1 pg);
4. FSI Inspection Report dated 1/16/03 (3 pgs);
5. FSI Inspection Report dated 1/16/03 (altered) (3 pgs);
6. TEC Control Systems 1/16/03 job work order;
7. TEC Certificate of Completion;

8. Contractor's Material and Test Certificate for Dry Pipe Systems;
9. Alarm History and Trouble History printouts from 1/19/03 by Barrett;
10. Discovery downloaded panel history;
11. Edited disc of download panel history;
12. Edited alarm history printout;
13. Dartmouth Fire District Pre-Fire Inspection Form;
14. Building permit field inspection sheets;
15. Building Permit;
16. Occupancy Permit;
17. Letter by Charles Barrett dated 10/6/03;
18. Chief McNamara's calendar sheets 1/17/02, 1/18/02, 4/1/02, 4/10/02, 4/23/02, 4/30/02;
19. Potter PS1OA pressure switch literature;
20. Potter PS40A high/low pressure switch literature;
21. FSI Inspection "tag" dated 11/20/02;
22. Sketch of valve and components by Higgins;
23. Diagram of sprinkler system and dry pipe valve with alarm components;
24. Contract between Residence Inn by Marriot and Pro Con Inc. - Project No. 300023;
25. Letter dated 10/13/03 from GAB to Tom Klem;
26. Weather data New Bedford, MA 11/2002 - 1/20/03;
27. Written statement of Charles Barrett dated 3/28/03;
28. NFPA 25 Inspector Testing and Maintaining of Water Based Fire Protection Systems, 2002 Edition;

29. Tom Klem's file;
 30. Paquette Electric's Field Electrical Work Order 1/22/03;
 31. McNamara Pre-Fire Inspection Form 4/30/02;
 32. KOR Dartmouth Fire Department, District No. 3;
 33. KOR Dartmouth Police Department;
 34. Routing sheets for 2002/2003 FSI;
 35. Canal Carpets 1/22/03 Invoice;
 36. ServiceMaster Invoice (4 pgs);
 37. James Smart transmittal letter with attachments dated 4/29/02 (3 pgs);
 38. There may be additional exhibits introduced during trial depending upon witness examination and cross-examination.
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- 2(b).
1. Jeff Andrews, FSS;
 2. Clint Rokowski, FSS;
 3. James Parenteau c/o Paquette Electric;
 4. Paul Balarino, FSS;
 5. William Bennett, FSS;
 6. Christopher Paquin, FSS, 885 School Street, Mansfield, MA (508) 339-4470;
 7. James Smart, Paquette Electric;
 8. Michael Zurowski, Paquette Electric;
 9. William Roland, former employee of Residence Inn;
 10. Mila Gendrin, former employee of Residence Inn, 247 Church Street, New Bedford, NH 02740;
 11. Lane Bennette, FSS employee;

12. Sandra Garcia, 24 Penniman Street, New Bedford, NH 02740;
and
13. Cory Rogers, former maintenance manager of Residence Inn,
169 Palmer Street, New Bedford, NH 02740.

Defendant, FSS reserves the right to supplement these disclosures.

The defendant,

Fire Suppression Systems of
New England, Inc.
By its attorneys,

/s/ Jocelyn M. Sedney

Jocelyn M. Sedney, BBO# 552115
BRODY, HARDOON, PERKINS & KESTEN, LLP
One Exeter Plaza
Boston, MA 02116
(617) 880-7100

Dated: August 25, 2006